

Atlantic Richfield Company

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July 14, 2017

Ms. Lynda Deschambault
SFD-7-2
USEPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

RE: Waste Material Off-Site Shipment Notification: Miscellaneous Waste
Leviathan Mine, Alpine County, California

Dear Mr. Riley:

Atlantic Richfield Company ("Atlantic Richfield") is submitting this letter in accordance with Paragraph 64 ("Off-Site Shipments") of the Administrative Settlement Agreement and Order on Consent for Removal Action, CERCLA Docket No. 2009-29 (effective January 21, 2009) (the "AOC"). This letter provides written notification of an off-site shipment of Waste Material (as defined in the AOC) to an out-of-state waste management facility described as follows:

(1) Name and location of facility to which Waste Material is to be shipped:	US Ecology Nevada, Inc. P.O. Box 578 Beatty, NV 89003 Phone: 1.800.239.3943 DeMenno/Kerdoon, Inc. 2000 N. Alameda Street Compton, CA 90222 Phone: 310-537-7100
(2) Type and Quantity of Waste Material to be shipped:	Miscellaneous waste materials (waste) resulting from various site operations and maintenance activities associated with acid drainage (AD) treatment at the Leviathan Mine Site (see attached table). 20 containers (16 at 55 gallons, 4 at 30 gallons) containing Waste Material will be shipped.
(3) Expected schedule for shipment of the Waste Material:	Waste is scheduled to be shipped on July 18, 2017.
(4) Method of Transportation:	By truck.



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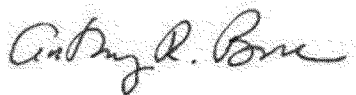
In addition to EPA, Atlantic Richfield is providing a copy of this written notification per the AOC to Mr. Eric Noack, with the Nevada Division of Environmental Protection Bureau of Waste Management. By letter dated February 6, 2009, Atlantic Richfield requested EPA's certification that the US Ecology facility in Beatty, Nevada is operating in compliance with the requirements of CERCLA Section 121(d)(3), § 9621(d)(3), and 40 C.F. R. § 300.440.

Regulatory Status

Atlantic Richfield's waste management contractor, Ponder Environmental Services, the US Ecology disposal facility, and the DeMenno/Kerdoon recycling facility have classified the Waste Material as summarized in the attached table.

If you have any questions or comments, please feel free to contact me at the numbers above or via e-mail at anthony.brown@bp.com.

Sincerely,



Anthony Brown
Project Manager Mining

Enclosures:

Table 1 –Miscellaneous Waste Inventory Summary

cc: Eric Noack, NDEP Bureau of Waste Management – via electronic
Nathan Block, BP – via electronic
Reginald Ilao, Atlantic Richfield Company – via electronic
Adam Cohen, Esq. Davis Graham & Stubbs LLP – via electronic
Dave McCarthy, Copper Environmental Consulting – via electronic
Marc Lombardi, Amec Foster Wheeler Environment & Infrastructure, Inc. – via electronic

TABLE 1
MISCELLANEOUS WASTE INVENTORY SUMMARY¹
 Leviathan Mine Site
 Alpine County, California

Container Number	Size (gallon)	Container Type	Location	Accumulation start date	Contents	Physical state	Waste classification
237	55	Poly Drum	WAA	9/13/17	Used PPE Solid	Non-Haz	
247	55	Poly Drum	WAA	4/24/17	Oily Debris Solid	Non-RCRA	
248	55	Poly Drum	WAA	4/24/17	Used PPE Solid	Non-Haz	
249	55	Poly Drum	WAA	4/27/17	Used Lime Bags	Solid Non-Haz	
250	30	Poly Drum	WAA	5/1/17	Used Buffer Solid	Non-RCRA	
252	55	Poly Drum	WAA	5/16/17	Used PPE Solid	Non-Haz	
253	55	Poly Drum	WAA	5/18/17	Used Lime Bags	Solid Non-Haz	
254	30	Steel Drum	WAA	5/19/17	Used Antifreeze	Liquid Non-RCRA	
255	55	Steel Drum	WAA	5/22/17	Used Oil ²	Liquid Non-RCRA	
256	55	Poly Drum	WAA	5/22/17	Used Lime Bags	Solid Non-Haz	
257	30	Poly Drum	WAA	5/25/17	Used Buffer Solid	Non-RCRA	
258	55	Poly Drum	WAA	5/31/17	Used Lime Bags	Solid Non-Haz	
259	55	Poly Drum	WAA	6/5/17	Used Lime Bags	Solid Non-Haz	
260	55	Poly Drum	WAA	6/9/17	Used Lime Bags	Solid Non-Haz	
261	55	Poly Drum	WAA	6/20/17	Used Lime Bags	Solid Non-Haz	
262	55	Poly Drum	WAA	6/29/17	Used Lime Bags	Solid Non-Haz	
263	55	Poly Drum	WAA	6/30/17	Used PPE Solid	Non-Haz	
264	55	Poly Drum	WAA	7/7/17	Used Lime Bags	Solid Non-Haz	
266	55	Poly Drum	WAA	7/11/17	Used Lime Bags	Solid Non-Haz	

Notes:

1. The above waste is scheduled to be removed from the site by July 18, 2017.
2. Recycling to be completed at DeMenno/Kerdoon, Inc.

Acronyms:

Haz – Hazardous
 HDS – High Density Sludge
 PPE – Personal Protective Equipment

RCRA – Resource Conservation and Recovery Act
 WAA – Waste Accumulation Area